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*Attorneys for Plaintiff and Class*

**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

KEVIN RISTO, on behalf of himself and  
 all others similarly situated,

Plaintiff,

v.

SCREEN ACTORS GUILD-  
 AMERICAN FEDERATION OF  
 TELEVISION AND RADIO ARTISTS,  
 a Delaware corporation; AMERICAN  
 FEDERATION OF MUSICIANS OF  
 THE UNITED STATES AND  
 CANADA, a California nonprofit  
 corporation; RAYMOND M. HAIR, JR,  
 an individual, as Trustee of the AFM and  
 SAG-AFTRA Intellectual Property  
 Rights Distribution Fund; TINO  
 GAGLIARDI, an individual, as Trustee  
 of the AFM and SAG-AFTRA  
 Intellectual Property Rights Distribution  
 Fund; DUNCAN CRABTREE-  
 IRELAND, an individual, as Trustee of  
 the AFM and SAG-AFTRA Intellectual  
 Property Rights Distribution Fund;  
 STEFANIE TAUB, an individual, as

**CASE NO. 2:18-CV-07241-CAS-PLA**

**CLASS ACTION**

**AMENDED JOINT EXHIBIT LIST**

Judge: Hon. Christina A. Snyder  
 Crtrm.: 8D – 8th Floor

Trial Date: August 17, 2021

1 Trustee of the AFM and SAG-AFTRA  
2 Intellectual Property Rights Distribution  
3 Fund; JON JOYCE, an individual, as  
4 Trustee of the AFM and SAG-AFTRA  
5 Intellectual Property Rights Distribution  
6 Fund; BRUCE BOUTON, an individual,  
7 as Trustee of the AFM and SAG-  
8 AFTRA Intellectual Property Rights  
9 Distribution Fund; and DOE  
10 DEFENDANTS 1-10,  
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12 Defendants.  
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Pursuant to Local Rule 16, Plaintiff Kevin Risto and Defendants Screen Actors Guild-American Federation of Television and Radio Artists, American Federation of Musicians of the United States and Canada, Raymond M. Hair, Jr, Tino Gagliardi, Duncan Crabtree-Ireland, Stefanie Taub, Jon Joyce, and Bruce Bouton, as Trustees of the AFM and SAG-AFTRA Intellectual Property Rights Distribution Fund, hereby submit the following joint exhibit list.

**Statute**

<b><u>NO. OF EXHIBIT</u></b>	<b><u>DESCRIPTION</u></b>	<b><u>DATE IDENTIFIED</u></b>	<b><u>DATE ADMITTED</u></b>
1.	Copyright Act: 17 U.S.C. Section 114(g) DEFS_00041367 - DEFS_00041378 (2/16 Crabtree-Ireland-8)		

**Fund- Related Documents**

2.	Declaration of Trust: AFM and AFTRA Intellectual Property Rights Distribution Fund 9/16/1998 DEFS_00000095 - DEFS_00000105 (Dreith Deposition)		
3.	Agreement and Declaration of Trust 2012 DEFS_00041367 - DEFS_00041378 (2/16 Crabtree-Ireland-1)		
4.	Data Purchase and Services Agreement (executed July 2013) DEFS_00000118 - DEFS_00000123 (2/17 Crabtree-Ireland-2)		

1	5.	AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund Conflict of Interest Policy WITHUM024542 - WITHUM024546 (Joyce-7)		
2	6.	AFM and SAG-AFTRA Intellectual Property Rights Distribution Fund Conflict of Interest Policy 4/21/2014 DEFS_00041528 - DEFS_00041537 (1/20/2021 Taub-2)		
3	7.	Crabtree-Ireland Conflict of Interest Policy DEFS_00041817A - DEFS_00041822A (2/16 Crabtree-Ireland-7)		
4	8.	*Conflict of Interest Policy: Acknowledgment and Financial Interest Disclosure Statement 4/20/2016 DEFS 00041548		
5	9.	*Conflict of Interest Policy: Acknowledgment and Financial Interest Disclosure Statement 2/27/2017 DEFS 00041566		
6	10.	Hair - Conflict of Interest Policy: Acknowledgment and Financial Interest Disclosure Statement DEFS_00041544 - DEFS_00041545 (1/20/2021 Taub-3)		
7	11.	Crabtree-Ireland - Conflict of Interest Policy: Acknowledgment and Financial Interest Disclosure Statement DEFS_00041541, DEFS_00041557 - DEFS_00041575 (1/20/2021 Taub-4)		

12.	Dreith Memo: Review and Discussion of Union Service Fees DEFS_00040589 - DEFS_00040592 (Dreith Deposition)		
13.	Introduction Letter RE Dreith Memo DEFS_00040593 (Dreith Deposition)		
14.	Analysis of significant provisions of the Data Purchase and Services Agreement DREITH_0027-DREITH_0031 (Dreith Deposition)		
15.	Dreith's Statement of Conflicts of Interest DREITH 0065 (Dreith Deposition)		
16.	*Current Trustees & Union Positions or Positions Relating to Unions DEFS_00042108 - DEFS_00042109 (Joyce Blondell-5)		
17.	*Organization Chart of Film Musicians Secondary Market DEFS_00042137 (Joyce Blondell-7)		
18.	*AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund Org Chart DEFS_00042171 (Joyce Blondell-12)		
19.	*Fund FY 2017 Current Staff Org Chart DEFS_00041642 (Sandell-1)		

20.	*Fund FY 2019 Current Staff Org Chart DEFS_00041645 (Sandell-2)		
21.	AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund Sound Recording Distribution Guidelines DEFS_00042288 - DEFS_00042290 (Joyce Blondell-29)		
22.	Sound Recording Distribution Guidelines DEFS_00000086		
23.	LexisNexis Subscription Agreement for Corporate Legal for AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund DEFS_00042333 - DEFS_00042337 (Joyce Blondell-33)		
24.	AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund, Summer 2014 Status Report DEFS_00042277 - DEFS_00042287 (Joyce Blondell-28)		
25.	Phonograph Recording Contract American Federation of Musicians 7/13/2019 DEFS_00041834 - DEFS_00041851 (Dreith Deposition)		
26.	WIPO Conference: The Global Digital Content Market DEFS_00041708		

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27.	Standing Committee on Copyright and Related Rights 7/11/2016 DEFS_00041713		
28.	102nd FIM EC Meeting – Rome, June 12-13, 2014 DRAFT AGENDA DEFS_00041718		
29.	FIM Presidium Meeting Paris 21-22 Nov. 2016 Proposed Agenda DEFS_00041734		
30.	FIM Presidium Meeting NYC 13-14 Mar. 2017 Proposed Agenda DEFS_00041736		
31.	The Economy of Streaming Media DEFS_00041740		
32.	Authors, Attribution, and Integrity: Examining Moral Rights in the United States 4/5/2016 DEFS_00041973		
33.	Roundtable: Copyright's Republic: The Contribution of Copyright to Culture, Freedom, and Human Flourishing DEFS_00041986		
34.	World Creators Summit 2013 4 & 5 June 2013 Speaker's brief DEFS_00041992		
35.	World Creators Summit June 4 & 5 Conference Program DEFS_00041996		
36.	Roundtable: Copyright's Republic: The Contribution of Copyright to Culture, Freedom, and Human Flourishing, Meeting Logistics DEFS_00041983		

37.	AFM Report Form – Phonograph Records, Soundtrack Release, Video Promos DEFS_00027616 - DEFS_00027623 (Painting-3)		
38.	*Trustee Travel 2013-Present (Excel Sheet) DEFS_00041637 (1/20/2021 Taub-11)		
39.	*AFM & SAG-AFTRA Fund: Advertising & Marketing – AFM & SAG-AFTRA payments 01/01/2013 – 10/13/2020 DEFS_00041588 (1/20/2021 Taub-12)		
40.	*Risto Fund Participant Information Form PLTF_0003 – PLTF_0005		
41.	*Risto Checks and Statements from Fund PLTF_0012 – PLTF_25; PLTF_0034 – PLTF_0035; PLTF_0121 – PLTF_0129		
42.	*Insurance Policies (Consolidated) DEFS_41260 – DEFS_41330; DEFS_41391 – DEFS_41452; DEFS_41452 – DEFS_41494		
43.	AS-400 Spreadsheet DEFS_00042028		
44.	50-Song Survey DEFS_00042027		
45.	Table of New Titles Created in AS400 by Year DEFS_00042020 (Oppo. to MSJ-Ex. 26)		



46.	Amounts of All Distributions 2011-2019 DEFS 00042640 (Joyce Blondell-57)		
47.	*Collections and Distribution Summary for AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund DEFS 00041695 - DEFS 00041699 (1/20/2021 Taub-10)		
48.	AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund Royalty Distribution Comparisons DEFS 00042430 - DEFS 00042443 (Joyce Blondell-45)		
49.	*Digital Performance Royalties – Research Progression by Year, 2017 Goal DEFS 00042525 (Joyce Blondell-50)		
50.	SR Unclaimed Status Report – Jan. 2017 DEFS 00042517 (Joyce Blondell-48)		
51.	*Account Summary by Activity Description DEFS 00042338 - DEFS 00042340 (Joyce Blondell-34)		

#### **Fund Board of Trustees Meeting Minutes**

52.	*AFM & AFTRA Fund Trustees Meeting, 3/29/2010 DEFS 00042165 - DEFS 00042166 (Joyce Blondell-10)		
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53.	*Minutes Meeting of the Trustees AFM & AFTRA Intellectual Property Rights Distribution Fund, 9/21/2011 DEFS_00042138 - DEFS_00042139 (Joyce Blondell-8)		
54.	*Minutes Meeting of the Trustees AFM & AFTRA Intellectual Property Rights Distribution Fund, 3/29/2012 DEFS_00042167 - DEFS_00042170 (Joyce Blondell-11)		
55.	6/4/2013 Board of Trustees Meeting Minutes DEFS_00040629A - DEFS_00040632A (Bouton-1)		
56.	12/12/2013 Board of Trustees Meeting Minutes DEFS_00040633A - DEFS_00040636A (Bouton-2)		
57.	*AFM & SAG-AFTRA Fund Trustees Meeting, 4/21/2014 DEFS_00042260 (Joyce Blondell-22)		
58.	Minutes Meeting of the Trustees AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund 4/21/2014 DEFS_00042261-DEFS_00042265 (Joyce Blondell-23)		
59.	*Minutes Meeting of the Trustees AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund 6/19/2014 DEFS_00042266 - DEFS_00042267 (Joyce Blondell-24)		

60.	*Trustee Meeting Minutes 7/28/2014 DEFS 00040615A		
61.	Minutes Meeting of the Trustees AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund 7/28/2014 DEFS 00042273 - DEFS 00042276 (Joyce Blondell-27)		
62.	Minutes Meeting of the Trustees AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund 10/20/2014 DEFS 00042291 - DEFS 00042294 (Joyce Blondell-30)		
63.	5/5/2015 Board of Trustees Meeting Minutes DEFS 00040619A - DEFS 00040623A (Bouton-5)		
64.	*Meeting of the Trustees AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund 4/20/2016 DEFS 00042390 - DEFS 00042395 (Joyce Blondell-38)		
65.	Meeting of the Trustees AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund 7/19/2016 DEFS 00042396 - DEFS 00042400 (Joyce Blondell-39)		
66.	*Meeting of the Trustees AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund 10/13/2016 (LeBlanc-6)		

67.	Meeting of the Trustees AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund 2/27/2017 DEFS_00042518 - DEFS_00042524 (Joyce Blondell-49)		
68.	Meeting of the Trustees AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund 11/19/2018 DEFS_00042612 - DEFS_00042617 (Joyce Blondell-52)		

**Emails**

69.	*4/26/2010 Emails RE Session Report Requests DEFS_00025103-DEFS_00025121 (Sandell-3)		
70.	*12/16/2010 Email chain RE Session Request DEFS_00021479 - DEFS_00021484 (White-1)		
71.	*2/15/2011 Emails RE Session Requestion DEFS_0002493- DEFS_00024936 (Sandell-4)		
72.	*Email from S. Hoffman to D. Dreith re Union services 10/24/2012 DEFS 00041251		
73.	E-mail RE Hi Dennis and Jo-Anne from Mikael in New York City 11/1/2012 DEFS_00042172 - DEFS_00042173 (Joyce Blondell-13)		

74.	December 27, 2012 Email Chain re Data Purchase and Service Agreement – AFM & SAG-AFTRA Fund DEFS_00041705 - DEFS_00041706		
75.	12/27/2012 Polach Email RE Data Purchase and Services Agreement DEFS_00041341 - DEFS_00041347 (2/24 Hair-2)		
76.	1/25/2013 Emails RE Statement Sena remuneration and administrative cost percentage 1/25/2013 DEFS_00040117 - DEFS_00040116 (Dreith Deposition)		
77.	5/30/2013 Email from Dreith RE Updated Budget 5/30/2013 DEFS_00040122 - DEFS_00040124 (Dreith Deposition)		
78.	*6/28/2013 Email RE AFM&SAG- AFTRA Fund distribution docsa[sic] DEFS_00040128 - DEFS_00040136 (Joyce-2)		
79.	*7/15/2013 Emails RE Session Request DEFS_00024821 - DEFS_00024823 (Sandell-5)		
80.	9/7/2013 Email to Ray Hair, et al., from Dennis Dreith with attachments DEFS_00040158 - DEFS_00040164 (Bouton-3)		

81.	9/7/2013 Replies to Email RE Admin Letter/Service Fee 9/7/2013 DEFS_00040165 (Dreith Deposition)		
82.	9/8/2013 Replies to Email RE Admin Letter/Service Fee 9/8/2013 DEFS_00040167 (Dreith Deposition)		
83.	9/8/2013 Joyce email response RE Admin Letter/Service Fee DEFS_00040166 - DEFS_00040167 (Joyce-4)		
84.	9/9/2013 Email RE Administrator Compensation 9/9/2013 DEFS_00040179 (Dreith Deposition)		
85.	*E-mail string RE New logos – with PDF attachments 9/12/2013 DEFS_00042205 - DEFS_00042207 (Joyce Blondell-16)		
86.	9/14/2013 Email to Dennis Dreith from Bruce Bouton DEFS_00040172 - DEFS_00040173 (Bouton-4)		
87.	E-mail RE SR(DPR) Distribution Guidelines 9/26/2013 DEFS_00042219 - DEFS_00042228 (Joyce Blondell-19)		
88.	*10/1/2013 Email RE Administrator Compensation DEFS_00040182		

	(10/20/2020 Taub-4)		
89.	10/2/2013 Email response RE Service Fee DEFS_00040189 (10/20/2020 Taub-5)		
90.	12/19/2013 Joyce Email RE a couple a things DEFS_00040211 (Joyce-6)		
91.	Email from A. Pollard to Hair re Hold the date. Broadcast Treaty briefing on June 11, 2014 5/27/2014 DEFS_00041720		
92.	Email from T. Shapiro to Crabtree- Ireland re ALAI Congress 17-20 Sept 2014 Brussels -- Moral Rights in the 21st Century 7/28/2014 DEFS_00041989		
93.	Email from Workflow Mailer to Crabtree-Ireland re Expense PXR2926 [Attachment: Notification Detail.html] 10/6/2014 DEFS_00041988		
94.	*10/18/2014 E-Mail Chain re "Dear Participant" Letter DEFS_00040227 - DEFS_00040229 (Carney-1)		
95.	*12/1/2015 Email RE Request for Session Reports DEFS_00010948 (White-2)		
96.	*Email from D. Dreith re A. Begluyan re AFM SAG-AFTRA Intellectual Ppty Rights Distrib Fd (25-04009) FS Draft		

	1/22/2016 DEFS 00041255		
97.	April 2016 Emails RE AFM 100th Convention DEFS 00041332 (2/24 Hair-7)		
98.	*Email from Heckman to Finnie re AFM Session Request for Chase Bryant - Red Bow - 2014 [Attachment: Musician Report Forms] 5/6/2016 DEFS 00028906		
99.	*7/13/2016 Emails RE Request for Session Reports DEFS 00010934 - DEFS 00010937 (White-3)		
100.	Email from D. Dreith to S. Hoffman re Service Fee Memo [Attachments: Serv Agreement summary.docx; Service fee cover.docx; Data Purchase and Service Agreement 2012.pdf] 1/2/2017 DEFS 00040500		
101.	Email from D. Dreith to S. Hoffman re Service Fee Memo 1/2/17 DEFS 00040516		
102.	Email from K. Tucker to D. Dreith re Service Fees 1/4/2017 DEFS 00040544		
103.	Email from D. Dreith to D. Crabtree-Ireland re Service Fees [Attachments: Data Purchase and Service Agreement 2012.pdf; Serv Agreement summary.docx; Service fee cover.docx]		



	1/12/2017 DEFS 00040456		
104.	*1/31/2018 Email RE Session Request DEFS_00025912 (Sandell-6)		
105.	*Email from K. Tucker to S. Hoffman and D. Dreith re AFM 2013 990 2/2/2017 DEFS 00040874		
106.	*2/9/2017 Email from Karina Huerta to Kevin Risto PLTF_0037		
107.	*1/24/2018 Email RE Session Request DEFS_00027914, DEFS_00027896 (Sandell-7)		
108.	Email re Questions 6/2/2017 DEFS_00040609 (Dreith Deposition)		
109.	Email from R. Rishik re AFM & SAG-AFTRA FUND Administrative Fees 6/3/2017 DEFS_00040610 (Dreith Deposition)		
110.	7/21/2017 Email RE Congratulations DREITH_0106 – DREITH_0108 (Oppo. to MSJ-Ex. 23)		
111.	6/12/2018 Email re “Plaintive Request” 6/12/18 DREITH_0136 (Dreith Deposition)		

112.	*Email from Reese to Creighton re SAG-AFTRA Session Report - Elton John - I'm Your Man [Attachment: Session Report] 9/13/2018 DEFS 00014853		
113.	5/14/2019 Email from Bruce Wayne to Kevin Risto re: Discog credits on Get Rich or Die Tryin PLTF_0117		
114.	5/24/2019 email RE Expense PXR 129279 DEFS_00041015 - DEFS_00041017 (10/20/2020 Taub-6)		
115.	6/10/2019 Email from Sidney White to Bruce Wayne re: data available to Fund PLTF_0118 - PLTF_0119		
116.	*Email from S. Hoffman to ljhirsc@yahoo.com FW: Quick Update 3/4/2021 HOFFMAN 0063		
117.	Dreith Email to "Steve" re media coverage of lawsuit DRIETH 0032 (Dreith Deposition)		
118.	Email from Dreith to Neil Stubenhaus re FB Blog Piece DRIETH 0175		
119.	*Emails RE Session Reports DEFS_00024887, DEFS_00015502, DEFS_00017045, DEFS_00018779, DEFS_00019595, DEFS_00019903, DEFS_00024966 (Oppo. to MSJ-Ex. 19)		

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120.	Emails RE Session Reports DEFS 00020594, DEFS 00020119, DEFS 00011479, DEFS 0024971, DEFS 00014583, DEFS 00034555, DEFS 00021479, DEF 00028917		
121.	*Kermit Emails DEFS 00013640 - DEFS 00013654; DEFS 00013656 - DEFS 13670; DEFS 00013672 - DEFS 13686; DEFS 00013688 - DEFS 13702; DEFS 00026304 - DEFS 26318; DEFS 00026321 - DEFS 26335 (Oppo. to MSJ-Ex. 21)		

### **Website Documents**

122.	*LinkedIn Profile of Kristina Gorbacsov (Gorbacsov-2)		
123.	*9/11/2017 "SAG-AFTRA is Your Voice in Music – Meet SAG- AFTRA's Music Department) (Gorbacsov-3)		
124.	Secretary of State Articles of Incorporation for Transparence Entertainment Group Inc. 11/8/17 (Dreith Deposition)		
125.	*LinkedIn Profile of Jennifer LeBlanc (LeBlanc-1)		
126.	*IRS Instructions for Schedule L (Form 990 or 990-EZ) (2019) (LeBlanc-5)		

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**Letters**

127.	May 7, 2009 Letter from Dennis Dreith, Kim Roberts Hedgpeth and Thomas Lee to SoundExchange Executive Director DEFS_00042019		
128.	*4/15/2010 Dear Participant Letter (Draft) 4/15//2010 DEFS_00040777 - DEFS_00040778 (Dreith Deposition)		
129.	10/15/2012 Dear Participant Letter DEFS_00040779 - DEFS_00040780 10/15/2012 (Dreith Deposition)		
130.	*9/30/2013 Dear Participant Letter DEFS_00040781 - DEFS_00040784 (1/20/2021 Taub-8)		
131.	Letter from J. Smith and B. Machuel to Hair re Rome meeting 6/25/2014 DEFS_00041722		
132.	Letter from Hair to Gagliardi re Belgrade SCAPR meetings 3/5/2015 DEFS_00041728		
133.	Letter from Hirschfeld Kramer LLP re April 20 Meeting 5/9/2016 DREITH_0003 (Dreith Deposition)		
134.	*Letter from K. Muller to S. Hoffman re April 20 Meeting 5/9/2016 HOFFMAN 0001		

135.	Pre-Interview Information for Potential Clients 5/7/17 (Dreith Deposition)		
136.	*2/8/2019 Letter from Ruben Rivera to Colin Gilbert PLTF_0031		

**Pleadings & Discovery**

137.	First Amended Complaint 11/20/2018		
138.	*Declaration of Stefanie Taub in Support of Defendants' Opposition to Plaintiff's Motion for Class Certification DKT. 68-1 (Joyce-1)		
139.	*Declaration of Stefanie Taub in support of Notice of Motion and Motion for Summary Judgment DKT. 107		
140.	*Declaration of Duncan Crabtree- Ireland in support of Notice of Motion and Motion for Summary Judgment DKT. 105		
141.	*Declaration of Ray Hair in support of Notice of Motion and Motion for Summary Judgment DKT. 106		
142.	*Declaration of Julie Sandell in support of Notice of Motion and Motion for Summary Judgment DKT. 108		

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1	143.	Declaration of Andrew Sullivan in support of Notice of Motion and Motion for Summary Judgment DKT. 109		
2				
3				
4	144.	*Responses of Defendant Bruce Bouton to Plaintiff's First Set of Interrogatories (Bouton-6)		
5				
6				
7	145.	*AMENDED Responses of Defendant Bruce Bouton to Plaintiff's First Set of Interrogatories		
8				
9				
10	146.	*Responses of Defendant Duncan Crabtree-Ireland to Plaintiff's First Set of Interrogatories		
11				
12	147.	*AMENDED Responses of Defendant Duncan Crabtree-Ireland to Plaintiff's First Set of Interrogatories		
13				
14				
15	148.	*Responses of Defendant Tino Gagliardi to Plaintiff's First Set of Interrogatories (Gagliardi-1)		
16				
17				
18	149.	*AMENDED Responses of Defendant Tino Gagliardi to Plaintiff's First Set of Interrogatories		
19				
20				
21	150.	*Responses and Objections of SAG-AFTRA to Plaintiff's Notice of Taking of Rule 30(B)(6) Deposition and Requests for Production of Documents (Gorbacsov-1)		
22				
23				
24				
25	151.	*Responses of Defendant Screen Actors Guild-American Federation of Television and Radio Artists to Plaintiff's First Set of Interrogatories		
26				
27				
28				

	(Gorbacsov-5)		
152.	*AMENDED Responses of Screen Actors Guild-American Federation of Television and Radio Artists to Plaintiff's First Set of Interrogatories		
153.	*Responses of Defendant Raymond Hair to Plaintiff's First Set of Interrogatories (2/24 Hair-8)		
154.	*AMENDED Responses of Defendant Raymond Hair to Plaintiff's First Set of Interrogatories		
155.	*Responses of Defendant Jon Joyce to Plaintiff's First Set of Interrogatories		
156.	*AMENDED Responses of Defendant Jon Joyce to Plaintiff's First Set of Interrogatories		
157.	*Defendants' Responses and Objections to Plaintiffs' First Set of Interrogatories DEFS_00042057 - DEFS_00042097 (Joyce Blondell-3)		
158.	*Defendants' Responses and Objections to Interrogatories Nos. 7 and 8 DEFS_00042098 - DEFS_00042107 (Joyce Blondell-4)		
159.	*Responses and Objections of AFM to Plaintiff's Notice of Taking of Rule 30(b)(6) Deposition and Requests for Production of Documents (Painting-1)		

160.	*Responses of Defendant American Federation of Musicians to Plaintiff's First Set of Interrogatories (Painting-4)		
161.	*AMENDED Responses of Defendant American Federation of Musicians to Plaintiff's First Set of Interrogatories		
162.	*Responses of Defendant Stefanie Taub to Plaintiff's First Set of Interrogatories (10/20/2020 Taub-2)		
163.	*AMENDED Responses of Defendant Stefanie Taub to Plaintiff's First Set of Interrogatories		
164.	*Responses and Objections of the AFM and SAG-AFTRA Intellectual Property Distribution Fund to Plaintiff's Subpoena and Notice of Taking Deposition and Requests for Production of Documents (1/20/2021 Taub-1)		
165.	*Plaintiff Kevin Risto's Responses to First Set of Interrogatories 7/5/2019		
166.	*Plaintiff Kevin Risto's Responses to First Set of Requests for Production 7/5/2019		
167.	*Plaintiff Kevin Risto's Responses to Second Set of Interrogatories 2/12/2021		
168.	<i>Blondell</i> Second Amended Complaint 2/7/2018		



169.	<i>Blondell</i> Order Granting Motion for Settlement 10/30/2020		
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**Financial Statements**

170.	*2010 Form 990 for AFM and AFTRA Intellectual Property Rights Distribution Fund DEFS_00042110 - DEFS_00042136 (Joyce Blondell-6)		
171.	*2011 Form 990 for AFM and AFTRA Intellectual Property Rights Distribution Fund DEFS_00042140 - DEFS_00042164 (Joyce Blondell-9)		
172.	*2013 Form 990 for AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund DEFS_00040241 - DEFS_00040265 (2/16 Crabtree-Ireland-4)		
173.	*2013 Amended Form 990 for AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund UPDATE filed 2/15/2016 DEFS_00041753 - DEFS_00041792 (2/16 Crabtree-Ireland-5)		
174.	*AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund Financial Statements, March 31, 2014 & 2013 MKA 000065 - MKA 000081 (1/20/2021 Taub-9)		

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175.	*2014 Form 990 - Return of Organization Exempt from Income Tax AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund 8/8/2016 DEFS_00040300		
176.	*2015 Form 990 - Return of Organization Exempt from Income Tax AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund 8/8/2016 DEFS 00040300		
177.	*2015 Form 8879-EO for AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund DEFS_00042344 - DEFS_00042386 (Joyce Blondell-36)		
178.	*AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund Consolidated Financial Statements 3/31/2015 DEFS_00000032 - DEFS_00000047 (Dreith Deposition)		
179.	*2016 Form 990 for AFM & SAG- AFTRA Intellectual Property Rights Distribution Fund DEFS_00042444 - DEFS_00042473 (Joyce Blondell-46)		
180.	*Consolidated Financial Statements March 31, 2016 2/27/2017 DEFS_00000065		

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181.	*2016 Form 990 - Return of Organization Exempt from Income Tax AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund 8/2/2018 DEFS_00040680		
182.	*2017 Form 990 - Return of Organization Exempt from Income Tax AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund 2/14/2019 DEFS_00040736		
183.	*2018 Form 990 - Return of Organization Exempt from Income Tax AFM & SAG-AFTRA Intellectual Property Rights Distribution Fund 2/10/2020 DEFS_00041650		
184.	*Consolidated Financial Statements March 31, 2018 and 2017 4/3/2019 DEFS_00000048		
185.	*Consolidated Financial Statements March 31, 2019 <a href="https://www.afmsagaftfund.org/Our-Annual-Report.php">https://www.afmsagaftfund.org/ Our-Annual-Report.php</a>		

**Miscellaneous**

186.	*S. Hoffman Meeting Notes (Meeting with Duncan Crabtree Ireland - 8/7/17) HOFFMAN 0033		
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187.	Chart Showing SoundExchange Board of Trustees 2021 <a href="http://www.soundexchange.com/about/our-team/board-of-directors/">www.soundexchange.com/ about/our-team/board-of-directors/</a>		
188.	Taub Deposition Notes DEFS_00041810 - DEFS_00041814		
189.	Hair Deposition Notes DEFS_00042024 - DEFS_00042426		
190.	Notes re: 2013 to 2020 income revenue for SAG-AFTRA (Duncan Deposition Notes) DEFS_00042021-23 (2/17 Crabtree-Ireland-3)		
191.	In re Determination of Royalty Rates and Terms for Ephemeral Recording and Digital Performance of Sound Recordings (WEB IV), Testimony of Raymond M. Hair, Jr., Docket No. 14-CRB-0001-WR (2016-2020)		
192.	Full Committee Hearing on Assessing the Impact of the Copyright Royalty Rates on Recording Artists and Webcasters, Committee on Small Business United States House of Representatives, One Hundred Tenth Congress, First Session, June 28, 2007, Serial Number 110-33		

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193.	Digital Performance Right in Sound Recordings and Ephemeral Recordings, Final Rule and Order, 72 FR 240844, May 1, 2007		
194.	In the Matter of Digital Performance Right in Sound Recordings and Ephemeral Recordings, Docket No. 2005-1 CRB DTRA, Testimony of Barrie L. Kessler, Chief Operating Officer, SoundExchange, Inc., October 2005		
195.	In the Matter of Adjustment of Rates and Terms for Preexisting Subscription Services and Satellite Digital Audio Radio Services, Docket No. 2006-1 CRB DSTR, Testimony of Barrie Kessler, Chief Operating Officer of Sound Exchange Inc., October 2006		
196.	In the Matter of Digital Performance Right in Sound Recordings and Ephemeral Recordings, Docket No. 2005-1 CRB DTRA, Hearing Transcript June 6, 2006, Testimony of Barrie Kessler		

**Expert Related Documents**

197.	David Nolte Curriculum Vitae (Nolte-1)		
198.	Fulcrum Financial Inquiry LLP Invoices NOLTE00000001 - NOLTE00000009;		

	NOLTE00001228 - NOLTE00001229 (Nolte-2)		
199.	Fulcrum Inquiry Retention Agreement NOLTE0000000010 - NOLTE0000000016 (Nolte-3)		
200.	Nolte Expert Report [Rule 26(a)(2)(B)] (Nolte-4)		
201.	“Steps in Valuing Intellectual Property” by Fulcrum Inquiry (Nolte-5)		
202.	*Adams Rebuttal Expert Report		
203.	*Curriculum Vitae of Kerry Adams (Adams-1)		
204.	Excel Sheet – Review of Foreign CMO: Costs and Data Sources (Adams-2)		
205.	Bookman Expert Report		
206.	Curriculum Vitae of Mark A. Bookman (Bookman-1)		
207.	Table: Service Fee as Percentage of Fund’s Administrative Cost (Bookman-2)		
208.	Tables: Service Fee as Percentage of Net Income for Unions (Bookman-3)		
209.	*Conflict of Interest Policy [Model] (Bookman-4)		

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210.	*PowerPoint Presentation: Legal Duties -- Orientation for Tax-Exempt Board of Directors (Bookman-5)		
211.	Bookman Rebuttal Report		
212.	Kessler Rebuttal Report		
213.	*Curriculum Vitae of (Kessler-1)		
214.	Kessler Report Table: Fund Researcher Hours (Kessler-T1)		
215.	*Nolte Report Table: Royalties Received by the Fund (Nolte-T1)		
216.	*Nolte Report Table: Fund's payment to Unions under the 2013 Agreement (Nolte-T2)		
217.	*Nolte Report Table: The Fund's royalties and payable to participants (Nolte-T3)		
218.	*Nolte Report Table: "Unclaimed" participants (Nolte-T4)		
219.	Nolte Report Table: Count of Union vs. non-union participants (Nolte-T5)		
220.	Nolte Report Table: New titles created in the Fund's database (Nolte-T8)		

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**Union Documents**

221.	SAG-AFTRA Constitution, October 2, 2015 (2/17 Crabtree-Ireland-1)		
222.	AFM Copyright Highlights & Advocacy Efforts DEFS_00042024 - DEFS_00042026 (2/25 Hair-1)		
223.	Bylaws of the Amer. Fed. of Musicians of US and Canada Revised 9/15/2019 (2/25 Hair-2)		

**Reserved**

224-240	[RESERVED FOR DEFENDANTS]		
241	LinkedIn Profile of Tino Gagliardi		
242	Responses and Objections of Defendant Bruce Bouton to Plaintiff's First Set of Requests for Admission 2/21/2021		
243	Responses and Objections of Defendant Duncan Crabtree-Ireland to Plaintiff's First Set of Requests for Admission 2/21/2021		
244	Responses and Objections of Defendant Tino Gagliardi to Plaintiff's First Set of Requests for Admission 2/21/2021		
245	Responses and Objections of Defendant Ray M. Hair, Jr. to Plaintiff's First Set of Requests for Admission 2/21/2021		



246	Responses and Objections of Defendant Jon Joyce to Plaintiff's First Set of Requests for Admission 2/21/2021		
247	Responses and Objections of Defendant Stefanie Taub to Plaintiff's First Set of Requests for Admission 2/21/2021		
248	Responses and Objections of Defendant AFM to Plaintiff's First Set of Requests for Admission 2/21/2021		
249	Responses and Objections of Defendant SAG-AFTRA to Plaintiff's First Set of Requests for Admission 2/21/2021		
250-270	[RESERVED FOR PLAINTIFF]		

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1 DATED: July 14, 2021

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